

**EXHIBIT A**

**FORM OF PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al.,  
  
Debtors.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

**ORDER AUTHORIZING FILING UNDER SEAL CERTAIN EXHIBITS TO GENERAL  
MOTORS LLC’S OBJECTION TO THE PROPOSED SETTLEMENT AMONG THE  
MOTORS LIQUIDATION GUC TRUST AND THE SIGNATORY ECONOMIC LOSS  
AND PERSONAL INJURY PLAINTIFFS**

Upon consideration of the motion (the “**Motion**”)<sup>1</sup> of General Motors LLC (“**New GM**”) for an order under section 107(b) of title 11 of the United States Code, Rule 9018 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 9018-1 authorizing the filing under seal of certain exhibits (the “**Subject Materials**”) to New GM’s *Objection to the Proposed Settlement Among the Motors Liquidation GUC Trust and the Signatory Economic Loss And Personal Injury Plaintiffs* (the “**Objection**”); the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; it appearing that proper and adequate notice of the Motion has been given; the Court having reviewed the Motion and having determined that the legal and factual basis set forth in the Motion establishes just cause for the relief granted herein; and upon due deliberation and sufficient cause appearing therefore; it is hereby

ORDERED that the Motion is granted as set forth herein; and it is further

---

<sup>1</sup> Capitalized terms not defined herein shall have the same meaning defined in the Motion.

ORDERED that New GM is authorized to file the Subject Materials under seal with this Court; and it is further

ORDERED that New GM is authorized to file redacted copies of the Subject Materials under seal on the Court's public docket for this matter; and it is further

ORDERED that counsel to the GUC Trust and the Signatory Plaintiffs shall have access to unredacted copies of the Subject Material and shall treat such Subject Material as confidential and in accordance with the terms of the MDL Protective Order;

ORDERED that the terms and conditions of this Order shall be immediately effective and enforceable upon its entry; and it is further

ORDERED that New GM shall retrieve the Subject Materials at the conclusion of proceedings relating to the Proposed Settlement (as defined in the Objection), subject to the terms of the MDL Protective Order (as defined in the Motion) and any other applicable protective order or applicable law governing the confidentiality of the Subject Materials; and it is further

ORDERED that this Order is without prejudice to the rights of any party in interest, or the United States Trustee, to seek to unseal the documents, or any part thereof.

Dated: March \_\_, 2019  
New York, New York

---

THE HONORABLE MARTIN GLENN  
UNITED STATES BANKRUPTCY JUDGE